

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION.

OCT 21 4 34 PM '03

RICHARD A. CAMPBELL and
MARY M. CAMPBELL,

Case No. 03-40164

Plaintiffs,

Hon.: Paul V. Gadola

vs.



BRIDGEVIEW MARINA, LTD.,
NEEDHAM'S MARINE, LTD., and
CAPTAIN'S YACHTING SERVICE, LTD.,

Defendants.

POTTER, DeAGOSTINO, CAMPBELL & O'DEA

Potter, DeAgostino, Campbell & O'Dea
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**PLAINTIFFS' RESPONSE TO DEFENDANT NEEDHAM'S MARINE, LTD.'S
MOTION TO DISMISS**

NOW COME Plaintiffs, Richard A. Campbell and Mary M. Campbell, by and through their attorneys Potter, DeAgostino, Campbell & O'Dea and submits the following as their Answer to Defendant Needham's Marine, Ltd.'s Motion to Dismiss:

1. Plaintiffs admit the allegations contained in paragraph 1 as true.
2. Plaintiffs admit the allegations contained in paragraph 2 as true.

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3. Plaintiffs admit the allegations contained in paragraph 3 as true.

4. Plaintiffs admit the allegations contained in paragraph 4 as true. Plaintiffs further state that Plaintiffs contracted with Defendant Needham's Marine to perform repairs.

5. Plaintiffs neither admit nor deny the allegations contained in paragraph 5 due to lack of information to form a belief. Plaintiffs leave Defendant to its proofs.

6. Plaintiffs admit the allegations contained in paragraph 6 as true.

7. Plaintiffs deny the allegations contained in paragraph 7 for the reason that they are untrue.

8. Plaintiffs deny the allegations contained in paragraph 8 for the reason that they are untrue.

9. Plaintiffs deny the allegations contained in paragraph 9 for the reason that they are untrue.

10. Plaintiffs deny the allegations contained in paragraph 10 for the reason that they are untrue.

11. Plaintiffs deny the allegations contained in paragraph 11 for the reason that they are untrue.

12. Plaintiffs deny the allegations contained in paragraph 12 for the reason that they are untrue.

13. Plaintiffs deny the allegations contained in paragraph 13 for the reason that they are untrue.

14. Plaintiffs deny the allegations contained in paragraph 14 for the reason that they are untrue.

15. Plaintiffs neither admit nor deny the allegations contained in paragraph 15 due to lack

of information to form a belief. Plaintiffs leave Defendant to its proofs.


16. Plaintiffs deny the allegations contained in paragraph 16 for the reason that they are untrue.

17. Plaintiffs rely upon their Response to Defendant Needham's Marine, Ltd.'s Motion to Dismiss for Lack of Personal Jurisdiction which to incorporate herein by reference.

18. Plaintiffs admit the allegations contained in paragraph 18 as true.

WHEREFORE, Plaintiffs respectfully requests that the instant motion be denied.

Respectfully submitted,
POTTER, DeAGOSTINO, CAMPBELL & O'DEA



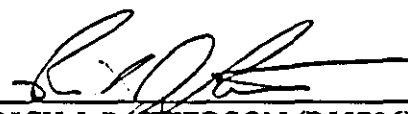
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Dated: October 27, 2003

BRIEF IN SUPPORT

Plaintiffs incorporate and rely on their Response and Brief to Defendants Bridgeview Marina, Ltd.'s and Captain's Yachting Service, Ltd.'s Motion to Dismiss and their Response and Brief to Defendant Needham's Marine, Ltd.'s Motion to Dismiss for Lack of Personal Jurisdiction in Support of their Response to Needham's Marine, Ltd.'s Motion to Dismiss.

Respectfully submitted,
POTTER, DeAGOSTINO, CAMPBELL & O'DEA



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